

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. ) C.A. No. 21-1644 (MN)  
UNITED STATES SUGAR )  
CORPORATION, UNITED SUGARS )  
CORPORATION, IMPERIAL SUGAR )  
COMPANY, and LOUIS DREYFUS )  
COMPANY LLC, )  
Defendants. )

**DEFENDANTS' MOTION TO TRANSFER VENUE  
PURSUANT TO 28 U.S.C. § 1404(a) OR TO EXPEDITE TRIAL**

Pursuant to 28 U.S.C. § 1404(a), Defendants United States Sugar Corporation, United Sugars Corporation, Imperial Sugar Company, and Louis Dreyfus Company LLC (collectively, “Defendants”) respectfully move this Court to transfer this action to the United States District Court for the Southern District of Georgia, or, in the alternative, expedite the trial to occur no later than April of 2022. The grounds for the motion are set forth in Defendants’ Opening Brief in Support of Their Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) or to Expedite Trial, filed concurrently herewith.

Pursuant to D. Del. L.R. 7.1.1, Defendants have conferred with counsel for the plaintiff, which intends to oppose the Motion.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Jack B. Blumenfeld*

OF COUNSEL:

Lawrence E. Buterman  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
(212) 906-1200

---

Jack B. Blumenfeld (#1014)  
Brian P. Egan (#6227)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
began@morrisnichols.com

Amanda P. Reeves  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW, Suite 1000  
Washington, DC 20004-1304  
(202) 637-2200

*Attorneys for Defendant United States Sugar Corporation*

Elyse M. Greenwald  
LATHAM & WATKINS LLP  
10250 Constellation Blvd., Suite 1100  
Los Angeles, CA 90067  
(213) 485-1234

RICHARDS, LAYTON & FINGER, P.A.

*/s/ Kelly E. Farnan*

OF COUNSEL:

Amanda L. Wait  
Vic Domen  
NORTON ROSE FULBRIGHT US LLP  
799 Ninth Street, NW, Suite 1000  
Washington, DC 20001  
(202) 662-4550

---

Kelly E. Farnan (#4395)  
One Rodney Square  
Wilmington, DE 19801  
(302) 651-7700  
farnan@rlf.com

Darryl Wade Anderson  
NORTON ROSE FULBRIGHT US LLP  
1301 McKinney Street, Suite 5100  
Houston, TX 77010-3095  
(713) 651-5562

*Attorneys for Defendants Imperial Sugar Company and Louis Dreyfus Company LLC*

HOGAN McDANIEL

*/s/ Daniel K. Hogan*

OF COUNSEL:

Timothy J. Pabst, Esquire  
Sharon R. Markowitz, Esquire  
STINSON LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
(612) 335-1500

---

Daniel K. Hogan (#2814)  
Daniel C. Kerrick (#5027)  
1311 Delaware Avenue, Suite 1  
Wilmington, DE 19806  
(302) 656-7540  
dkhogan@dkhogan.com  
dckerrick@dkhogan.com

*Attorneys for Defendant United Sugars  
Corporation*

December 3, 2021

**RULE 7.1.1 CERTIFICATE**

Pursuant to D. Del. LR 7.1.1, counsel for Defendants United States Sugar Corporation certifies that counsel for the parties, including Delaware counsel, discussed the subject matter of the foregoing motion and the relief sought, and that the parties have been unable to reach agreement.

*/s/ Jack B. Blumenfeld*

---

Jack B. Blumenfeld (#1014)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. ) C.A. No. 21-1644 (MN)  
UNITED STATES SUGAR )  
CORPORATION, UNITED SUGARS )  
CORPORATION, IMPERIAL SUGAR )  
COMPANY, and LOUIS DREYFUS )  
COMPANY LLC, )  
Defendants. )

**[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION TO TRANSFER VENUE  
PURSUANT TO 28 U.S.C. § 1404(a) OR TO EXPEDITE TRIAL**

This matter is before the Court on Defendants' Motion to Transfer Venue Pursuant To 28 U.S.C. § 1404(a) Or To Expedite Trial ("Motion"). For good cause shown, the Motion is GRANTED, and it is HEREBY ORDERED that:

The Clerk of Court is directed to transfer this action to the U.S. District Court for the Southern District of Georgia, Savannah Division, pursuant to 28 U.S.C. § 1404(a).

IT IS SO ORDERED THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2021.

HONORABLE MARYELLEN NOREIKA  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 3, 2021, upon the following in the manner indicated:

Laura D. Hatcher, Esquire  
Shamoor Anis, Esquire  
UNITED STATES ATTORNEY'S OFFICE  
DISTRICT OF DELAWARE  
1313 North Market Street, Suite 400  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Brian Hanna, Esquire  
U.S. DEPARTMENT OF JUSTICE  
ANTITRUST DIVISION  
450 Fifth Street, NW, Suite 8000  
Washington, DC 20530  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

*/s/ Jack B. Blumenfeld*

---

Jack B. Blumenfeld (#1014)